

Brian A. Bender, Esq. (BAB-0218)  
Harris Beach PLLC  
100 Wall Street  
New York, New York 10005  
(212) 687-0100

***Attorneys for Defendant***  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

NUBIA HERNANDEZ,

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, EMPIRE  
STATE PROPERTIES, INC., HUDSON TOWERS  
HOUSING CO., INC., LEFRAK ORGANIZATION,  
INC., AND RECTOR OF TRINITY CHURCH,

Defendants.

---

Case No.:  
08-CV-2636

**NOTICE OF ADOPTION  
OF ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of In Re: World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
May 3, 2008

Yours, etc.,

**HARRIS BEACH PLLC**

---

Brian A. Bender, Esq. (BAB-0218)  
*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**  
100 Wall Street  
New York, New York 10005  
(212) 687-0100

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

NUBIA HERNANDEZ,

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, EMPIRE  
STATE PROPERTIES, INC., HUDSON TOWERS  
HOUSING CO., INC., LEFRAK ORGANIZATION,  
INC., AND RECTOR OF TRINITY CHURCH,

,

Defendants.

Case No.:  
08-CV-2636

**CERTIFICATE OF  
SERVICE**

---

The undersigned certifies that on May 3, 2008, I caused to be filed and served the following documents electronically via the Court's ECF system upon the parties:

1. Notice of Adoption of Answer to Master Complaint of Lefrak Organization, Inc.

Dated: New York, New York  
May 3, 2008

---

Brian A. Bender

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

NUBIA HERNANDEZ,

Case No.:  
08-CV-2636

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, EMPIRE  
STATE PROPERTIES, INC., HUDSON TOWERS  
HOUSING CO., INC., LEFRAK ORGANIZATION,  
INC., AND RECTOR OF TRINITY CHURCH,

,

Defendants.

---

**NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

**HARRIS BEACH PLLC**  
*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**  
100 Wall Street  
New York, New York 10005  
(212) 687-0100